

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

MARCUS AND SHERRI BEEBE,

Plaintiffs,

v.

**UNITRIN AUTO AND HOME
INSURANCE COMPANY,**

Defendant.

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Civil Action No. _____

JURY DEMAND

PETITION FOR REMOVAL

PLEASE TAKE NOTICE that the Defendant, Unitrin Auto and Home Insurance Company, hereby removes this case to the United States District Court for the Middle District of Tennessee, Nashville Division, pursuant to 28 U.S.C. §§. 1441 and 1446. The grounds for the removal are as follows:

1. Plaintiffs filed the above-styled action on February 10, 2016, against Unitrin Auto and Home Insurance Company in the Chancery Court of Wilson County, Tennessee. A true and correct copy of the Complaint in the suit is styled: Marcus and Sherri Beebe v. Unitrin Auto and Home Insurance Company, Wilson County Circuit Court Case Number 2016CV39 is attached hereto as Exhibit 1.

2. The suit was served on the Tennessee Department of Commerce and Insurance on February 12, 2016 and was sent to Defendant, Unitrin Auto and Home Insurance Company thereafter.

3. Other than the filing of the Complaint, no proceedings have taken place in this matter. This Defendant removes this action to the United States District Court for the Middle District of Tennessee, Nashville Division pursuant to the provisions of 28 U.S.C. § 1441 on the grounds that this Court has jurisdiction pursuant to 28 U.S.C. §§ 1332 and 1333.

4. Plaintiffs Marcus Beebe and Sherri Beebe allege in the Complaint that they are the owners of the home located at 1517 Yarmouth Lane, Old Hickory, (Wilson County) Tennessee.

5. Unitrin Auto and Home Insurance Company is a New York Company with its principal place of business located in Jacksonville, (Duval County) Florida.

6. This dispute is between persons (companies) of different states and the amount in dispute, based upon allegations made in the complaint are in excess of \$75,000.00, exclusive of costs and interest; therefore, it also meets the jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

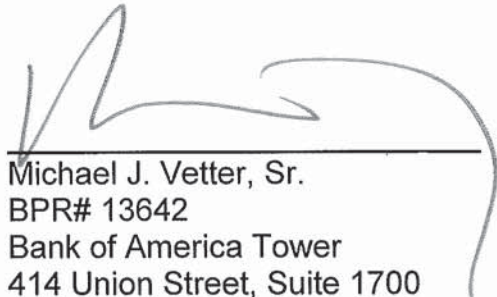
7. Venue is correct herein because Plaintiff's action is pending in Wilson County, Tennessee.

8. Counsel for the Defendant has served on counsel for Plaintiffs a copy of this Petition for Removal and a copy of the Petition for Removal will be filed in the Wilson County Chancery Court by the Defendant within 30 days of service of the Complaint on the Defendant.

WHEREFORE, please take notice that Defendant, the Unitrin Auto and Home Insurance Company removes the state action styled Marcus and Sherri Beebe v. Unitrin Auto and Home Insurance Company, Wilson County Circuit Court Case Number 2016CV39 from the Chancery Court of Sumner County, where it is now pending, to the United States District Court for the Middle District of Tennessee on this the 11th day of March, 2016.

Respectfully submitted,

SPICER RUDSTROM PLLC




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(615) 259-9080 telephone
(615) 259-1522 facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, properly addressed to:

Sonya Wright
FARRAR | WRIGHT, PLLC
122 North Church Street
Murfreesboro, TN 37130
(615) 800-4747

this 11th day of March, 2016.



Michael J. Vetter, Sr.